

AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION OF NORTHERN CALIFORNIA  
WILLIAM S. FREEMAN (SBN 82002)  
SEAN RIORDAN (SBN 255752)  
39 Drumm Street  
San Francisco, CA 94111  
Telephone: (415) 621-2493  
Facsimile: (415) 255-8437  
Email: wfreeman@aclunc.org  
sriordan@aclunc.org

ACLU FOUNDATION  
IMMIGRANTS' RIGHTS PROJECT  
JUDY RABINOVITZ  
125 Broad Street, 18<sup>th</sup> Floor  
New York, NY 10004  
Telephone: (212) 549-2660  
Facsimile: (212) 549-2654  
E-mail: jrabinovitz@aclu.org

LAW OFFICES OF HOLLY S. COOPER  
HOLLY S. COOPER (SBN 197626)  
P.O. Box 4358  
Davis, CA 95617  
Telephone: (530) 574-8200  
Facsimile: (530) 752-0822  
Email: hscooper@ucdavis.edu

Attorneys for Petitioner/Plaintiff

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

Ilsa Saravia, as next friend for A.H., a  
minor, on behalf of herself individually and  
others similarly situated,

Plaintiff,

v.

Robert Wilkinson, Acting Attorney  
General, et al.,

Respondents/Defendants.

COOLEY LLP  
MARTIN S. SCHENKER (SBN 109828)  
101 California Street, 5<sup>th</sup> Floor  
San Francisco, CA 94111  
Telephone: (415) 693-2000  
Facsimile: (415) 693-2222  
Email: mschenker@cooley.com  
ncooper@cooley.com  
acorkery@cooley.com

ACLU FOUNDATION  
IMMIGRANTS' RIGHTS PROJECT  
STEPHEN B. KANG (SBN 292280)  
39 Drumm Street  
San Francisco, CA 94111  
Telephone: (415) 343-0770  
Facsimile: (212) 395-0950  
E-mail: skang@aclu.org

NEW YORK CIVIL LIBERTIES UNION  
FOUNDATION  
AMY BELSHER  
JESSICA PERRY  
125 Broad Street, 19<sup>th</sup> Floor  
New York, NY 10004  
Telephone: (212) 607-3300  
Facsimile: (212) 607-3318  
Email: apadmanabhan@nyclu.org  
cdunn@nyclu.org

Case No. 3:17-cv-03615-VC

**STIPULATION AND ~~PROPOSED~~  
ORDER RE EXTENSION OF CLASS  
NOTICE DEADLINE**

RECITALS

WHEREAS, pursuant to Paragraph VIII.F of the Settlement Agreement in this case, the deadline for mailing the Updated Class Notice to the individuals on the Class List and their attorneys is currently Thursday, February 18, 2021; and

WHEREAS, the Parties have been diligently meeting and conferring concerning the language of the Updated Class Notice and its shortened version, and translating those Notices into Spanish; and

WHEREAS, the Parties are close to finalizing the English and Spanish versions of the Notices, but require a brief period of additional time to complete that process; and

WHEREAS, after finalizing the Notices, Defendants will require time to mail the Updated Class Notice pursuant to Paragraph VIII.F.3 of the Agreement;

STIPULATION

It is hereby agreed between the Parties, subject to the Order of the Court, as follows:

The Parties jointly request that the Court extend the deadline for mailing the Updated Class Notice pursuant to Paragraph VIII.F.3 of the Agreement until Monday, March 1, 2021.

1 Dated: February 17, 2021

COOLEY LLP  
/s/ Martin S. Schenker  
Martin S. Schenker

3 Dated: February 17, 2021

AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION OF NORTHERN CALIFORNIA  
/s/ William S. Freeman  
William S. Freeman

7 Dated: February 17, 2021

AMERICAN CIVIL LIBERTIES UNION  
IMMIGRANTS' RIGHTS PROJECT  
/s/ Stephen B. Kang  
Stephen B. Kang

10 Dated: February 17, 2021

LAW OFFICES OF HOLLY COOPER  
/s/ Holly S. Cooper  
Holly S. Cooper

14 Dated: February 17, 2021

NEW YORK CIVIL LIBERTIES UNION  
FOUNDATION  
/s/ Amy Belsher  
Amy Belsher  
*Attorneys for Petitioner/Plaintiff*

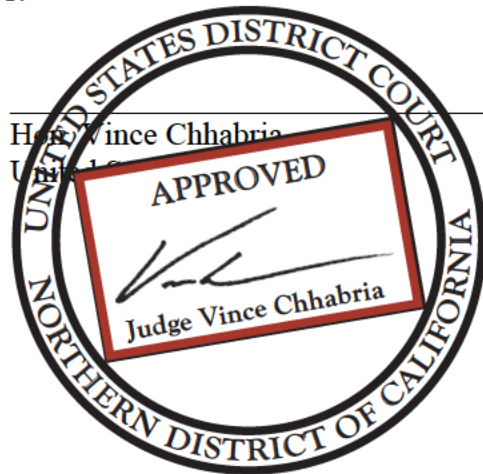
17 Dated: February 17, 2021

UNITED STATES DEPARTMENT OF JUSTICE  
/s/ Nicole N. Murley  
Nicole N. Murley  
*Counsel for Respondents/Defendants*

~~PROPOSED~~ ORDER

Upon the stipulation of the Parties, and good cause appearing, IT IS HEREBY ORDERED that the deadline for mailing the Updated Class Notice pursuant to Paragraph VIII.F.3 of the Agreement is extended until Monday, March 1, 2021.

Dated: February 18, 2021



**ATTESTATION**

Pursuant to Civil L.R. 5-1(i)(3) regarding signatures, I attest under penalty of perjury that concurrence in the filing of this document has been obtained from the other signatories.

Dated: February 17, 2021

/s/ Stephen B. Kang

Stephen B. Kang

Attorney for Plaintiff